

1 COLLETTE C. LELAND, WSBA No. 40686  
2 KAMMI MENCKE SMITH, WSBA No. 34911  
3 WINSTON & CASHATT, LAWYERS, a  
4 Professional Service Corporation  
5 601 W. Riverside, Ste. 1900  
6 Spokane, Washington 99201  
7 Telephone: (509) 838-6131  
8 Facsimile: (509) 838-1416

9 Attorneys for Plaintiff

10 UNITED STATES DISTRICT COURT  
11 EASTERN DISTRICT OF WASHINGTON

12 CORY J. ROSEN, an individual,

13 Plaintiff,

No. CV-15-00153-RMP

14 vs.

PLAINTIFF'S WITNESS LIST

15 PEND OREILLE COUNTY, a local  
16 government entity, PEND OREILLE  
17 COUNTY SHERIFF ALAN  
18 BOTZHEIM, an individual, PEND  
19 OREILLE COUNTY SHERIFF'S  
20 DEPARTMENT, a local government  
21 entity, and UNDERSHERIFF GRANT  
22 SIREVOG, an individual,

23 Defendants.  
24

1 Pursuant to the Court's Scheduling Conference Order dated September 3,  
2  
3 2015 (ECF No. 7), Plaintiff Cory Rosen submits the following list of witnesses  
4 Plaintiff expects to testify at trial.

- 5 1. Jerry Dobson  
6 Georgia  
7 (509) 671-6910

8 Mr. Dobson is expected to testify regarding the procedures and practices of  
9 the Pend Oreille County Sheriff's Office (POCSO), including its discipline of  
10 deputies. Mr. Dobson will testify regarding Mr. Rosen's reputation performance as  
11 a deputy. Mr. Dobson will testify regarding the interactions between the POCSO  
12 deputies, Teamsters Local 690 (Local 690), POCSO, and candidates for the office  
of sheriff. Mr. Dobson will testify regarding his personal knowledge of the facts  
surrounding the internal investigation and discipline of Mr. Rosen.

- 13 2. Deputy Daniel Dice  
14 Pend Oreille County Sheriff's Office  
15 331 S. Garden Avenue  
16 Newport, WA 99156  
17 (509) 671-2315

18 Deputy Dice is expected to testify regarding Mr. Rosen's performance and  
19 reputation as a Pend Oreille County Sheriff's Deputy. Deputy Dice is expected to  
20 testify regarding Mr. Rosen's discipline and termination from Pend Oreille County  
21 Sheriff's Office. Deputy Dice is expected to testify regarding the practices of  
22 POCSO in relation to its employees.

- 23 3. Steven Bruchman  
24 Teamsters Local 760  
12111 W. Lincoln  
(509) 452-7194

1 Mr. Bruchman is expected to testify regarding the procedures and practices  
2 of POCSO, including its discipline of deputies and its interactions with Local 690  
3 Local 690. Mr. Bruchman is expected to testify regarding the interactions between  
4 the POCSO deputies, Teamsters Local 690, and candidates for the office of sheriff.  
5 Mr. Bruchman is expected to testify regarding his personal knowledge of the facts  
6 surrounding the internal investigation and discipline of Mr. Rosen. Mr. Bruchman  
7 will testify regarding Mr. Rosen's activities as shop steward for Local 690.

- 8 4. Jeff Jones  
9 Liberty Lake Police Department  
10 23127 E. Mission Ave.  
11 Liberty Lake, WA 99019  
12 (509) 755-1144

13 Officer Jones is expected to testify regarding Mr. Rosen's performance and  
14 reputation as a deputy for POCSO and POCSO conduct toward Mr. Rosen. Officer  
15 Jones will testify regarding POCSO's pattern of conduct toward its employees.

- 16 5. Cory Rosen  
17 c/o Winston & Cashatt, Lawyers  
18 601 W. Riverside Ave., Suite 1900  
19 Spokane, WA 99201  
20 (509) 838-6131

21 As Plaintiff, Mr. Rosen is expected to testify regarding the facts and  
22 circumstances surrounding the events and facts from which his claims and  
23 damages arise.

- 24 6. Dawn Taylor, Executive Administrative Assistant  
Pend Oreille County Sheriff's Office  
331 S. Garden Avenue  
Newport, WA 99156  
(509) 447-3151

1 Ms. Taylor is expected to testify regarding the Defendants' communications  
2 with employers and potential employers of Mr. Rosen. Ms. Taylor will testify  
3 regarding the policies and practices of the POCSO, including the creation and  
4 retention of personnel records. Ms. Taylor is expected to testify regarding her  
5 personal knowledge of Mr. Rosen and Defendants' conduct toward him.

6 7. Scott Doughty  
7 141 Lady Ct.  
8 Newport, WA 99156  
9 (509) 292-0348

10 Mr. Doughty is expected to testify regarding the facts and circumstances  
11 surrounding the events leading to Mr. Rosen's termination. Mr. Doughty is  
12 expected to testify regarding Defendants' treatment of employees and ex-  
13 employees.

14 8. Steven Higgins  
15 Pend Oreille County Jail  
16 331 S. Garden Avenue  
17 Newport, WA 99156

18 Mr. Higgins is expected to testify regarding the facts and circumstances  
19 surrounding the events leading to Mr. Rosen's termination. Mr. Higgins will testify  
20 regarding Defendants' pattern of conduct toward employees and ex-employees of  
21 POCSO.

22 9. Jon Carmen, Detective  
23 Pend Oreille County Sheriff's Office  
24 331 S. Garden Avenue  
Newport, WA 99156  
(509) 447-3151

Det. Carmen is expected to testify regarding Defendants' pattern of conduct  
toward employees and ex-employees of POCSO. Det. Carman is expected to  
testify regarding the facts and circumstances surrounding the events leading to Mr.

1 Rosen's termination. Det. Carman has knowledge of the reputations of the  
2 personnel at POCSO. Det. Carman is expected to testify regarding the interactions  
3 between Local 690 and Defendants POCSO, Botzheim, and Sirevog.

4 10. Sgt. Glenn Blakeslee  
5 Pend Oreille County Sheriff's Office  
6 331 S. Garden Avenue  
7 Newport, WA 99156  
8 (509) 447-1911

9 Sgt. Blakeslee is expected to testify regarding the internal investigations into  
10 Mr. Rosen's conduct while he was employed by POCSO and communications with  
11 the Defendants regarding the same. Sgt. Blakeslee is expected to testify regarding  
12 the practices and policies of POCSO. Sgt. Blakeslee will testify regarding  
13 POCSO's treatment of Mr. Rosen after his termination.

14 11. Joseph Kuhn  
15 Teamsters Local 690  
16 1912 N. Division St., Suite #200  
17 Spokane, WA 99207  
18 (509) 455-9410

19 Mr. Kuhn is expected to testify regarding the facts and circumstances  
20 surrounding the discipline and termination of Mr. Rosen, and events following his  
21 termination. Mr. Kuhn is expected to testify regarding POCSO's interactions with  
22 Local 690 and Defendants' conduct toward employees of POCSO.

23 12. D.P. Van Blaricom  
24 835 91st Lane N.E.  
Bellevue, WA 98004-4811  
(425) 453-0082

Mr. Van Blaricom will provide expert testimony regarding the investigation,  
discipline and termination of Mr. Rosen.

1           13.   Dolly N. Hunt, Prosecuting Attorney  
2               Pend Oreille County Prosecuting Attorney's Office  
3               229 S. Garden Avenue  
4               Newport, WA 99156  
5               (509) 447-4414

6           Prosecuting Attorney Hunt is expected to testify regarding the facts and  
7           circumstances surrounding Mr. Rosen's discipline and termination, as well as  
8           communications with potential employers of Mr. Rosen and Washington  
9           Department of Corrections (DOC).

10          14.   Det. Sal Mancini  
11               Quincy Police Department  
12               104 B St. SW  
13               Quincy, WA 98848  
14               (509) 787-4718

15          Det. Mancini is expected to testify regarding communications by members  
16          of the Pend Oreille County Sheriff's Office to the City of Quincy Police  
17          Department in response to a background check by Quincy PD. Det. Mancini will  
18          testify regarding the pattern and practices of POCSO toward its employees and  
19          former employees.

20          15.   Michelle Gaines, Winthrop  
21               Clerk/Treasurer  
22               206 Riverside Avenue  
23               Winthrop, WA 98862

24          Ms. Gaines will testify by deposition regarding Mr. Rosen's application for  
employment by the City of Winthrop, including information provided by POCSO.

1           16.   Travis Feldner  
2               (509) 671-6870

3           Mr. Feldner will testify regarding Mr. Rosen's efforts to obtain employment  
4 with the Kalispel Tribal Police.

5           17.   John W. Hunt  
6               c/o Adams County Sheriff's Office  
7               210 W. Broadway  
8               Ritzville, WA 99169  
              (509) 659-1122

9           Mr. Hunt is expected to testify regarding Mr. Rosen's application for  
10 employment with the Adams County Sheriff's Office.

11           18.   Alan Botzheim  
12               Pend Oreille County Sheriff's Office  
13               331 S. Garden Avenue  
14               Newport, WA 99156  
              (509) 447-1901

15           Sheriff Botzheim is expected to testify by deposition regarding the policies  
16 and practices of POCSO regarding the discipline and termination of its employees.  
17 Sheriff Botzheim is expected to testify regarding POCSO communications with  
18 potential or current employers of Mr. Rosen. Sheriff Botzheim is expected to  
19 testify regarding the facts and circumstances surrounding the discipline and  
termination of Mr. Rosen.

20           19.   Grant Sirevog  
21               Pend Oreille County Sheriff's Office  
22               331 S. Garden Avenue  
23               Newport, WA 99156  
              (509) 447-1902

1 Undersheriff Sirevog is expected to testify by deposition regarding  
2 Defendants POCSO, Botzheim, and Sirevog's communications with the employer  
3 and potential employers of Mr. Rosen. Undersheriff Sirevog is expected to testify  
4 regarding the facts and circumstances surrounding the discipline and termination of  
Mr. Rosen.

5 20. Jeffrey D. Hawkins  
6 Washington Department of Corrections  
7 309 W. Second Ave.  
8 Newport, WA

9 Mr. Hawkins will testify regarding Defendants Botzheim and Sirevog's  
10 communications with Mr. Hawkins regarding Mr. Rosen.

11 21. Kim Allen-Holman, Community Corrections Supervisor  
12 Washington Department of Corrections  
13 Community Corrections Division  
14 210 N. 2nd Street  
15 Yakima, WA 98901  
16 (509) 225-2400

17 Ms. Allen-Holman will testify by deposition regarding Mr. Rosen's  
18 application for employment with the Washington Department of Corrections  
19 (DOC) and DOC's hiring of Mr. Rosen, including the background check of and  
20 interviews with Mr. Rosen. Ms. Allen-Holman will testify regarding Mr. Rosen's  
21 performance as a community corrections officer and his disclosures to DOC  
22 regarding his employment and disciplinary history. Ms. Allen-Holman will testify  
23 regarding Undersheriff Sirevog's communications with DOC and documents  
24 provided by POCSO to DOC. Ms. Allen-Holman will testify regarding  
Mr. Rosen's termination from DOC.



1           22.    Ronald Pedersen, Field Administrator  
2                   Washington Department of Corrections  
3                   Community Corrections Division  
4                   210 N. 2nd Street  
5                   Yakima, WA 98901  
6                   (509) 225-2400

7           Mr. Pedersen will testify by deposition regarding Mr. Rosen's termination  
8           by DOC.

9           23.    Jacki Tucker, Council Representative  
10                   4918 N. Stevens St.  
11                   Spokane, WA 99205  
12                   (509) 847-3590

13           Ms. Tucker is expected to testify regarding the facts and circumstances  
14           surrounding DOC's termination of Mr. Rosen.

15           24.    Detective Robert Layman  
16                   Sunnyside Police Department  
17                   401 Homer Street  
18                   Sunnyside, WA 98944  
19                   (509) 836-6305

20           Det. Layman is expected to testify regarding Defendants Sirevog and  
21           POCSO's communications with the City of Sunnyside regarding Mr. Rosen.

22           25.    Rev. Jared Horton  
23                   Real Life Newport  
24                   420 W. 4th St.  
                  Newport, WA 99156

          Rev. Horton will testify regarding Mr. Rosen's reputation in the community  
          and Mr. Rosen's damages incurred as a result of the conduct of Defendants.

1           26.   Shelly Stafford Peters  
2                   Pend Oreille County Human Resources  
3                   P.O. Box 5025  
4                   Newport, WA 99156  
5                   (509) 447-6499

6           Ms. Peters is expected to testify regarding the human resources policies and  
7           procedures of Pend Oreille County and all training provided to its employees. Ms.  
8           Stafford will testify regarding the policies and procedures governing the  
9           maintenance and disclosure of information held in the personnel files of Pend  
10          Oreille County employees and held by the Pend Oreille County Civil Service  
11          Commission. Ms. Peters will testify regarding the termination of Mr. Rosen and  
12          responses to inquiries from potential employers concerning Mr. Rosen.

13          27.   Matthew McKay  
14                   Liberty Lake Police Department  
15                   23127 E. Mission Ave.  
16                   Liberty Lake, WA 99019  
17                   (509) 671-2891

18          Officer McKay is expected to testify regarding the facts and circumstances  
19          surrounding the discipline and termination of Mr. Rosen, including his  
20          performance as a deputy and the conduct of Defendants toward their employees.

21          28.   Marianne Nichols  
22                   Pend Oreille County Auditor  
23                   625 W. 4th St.  
24                   Newport, WA 99156  
                  509-447-6474

          Ms. Nichols is expected to testify regarding background checks regarding  
          Mr. Rosen by outside agencies and Pend Oreille County's responses to requests for  
          public records.

1           29.   Mark Sterk  
2               20411 S SR 27  
3               Rockford, WA 99030  
4               (509) 370-0675

5           Mr. Sterk will provide expert testimony regarding normal practices of  
6 procedures of law enforcement agencies relating to discipline, termination, and  
7 responses to reference checks. Mr. Sterk will offer expert testimony regarding the  
conduct of Defendants.

8           30.   Walter Collins  
9               20411 S SR 27  
10              Rockford, WA 99030  
11              (509) 998-9766

12          Mr. Collins will provide expert testimony regarding normal practices of  
13 procedures of law enforcement agencies relating to discipline, termination, and  
14 responses to reference checks. Mr. Collins will offer expert testimony regarding  
the conduct of Defendants.

15          31.   Gary Carlsen  
16               20411 S SR 27  
17               Rockford, WA 99030  
18               (509) 263-7597

19          Mr. Carlsen will provide expert testimony regarding the reasonable salary  
20 and time until hiring expectations of law enforcement officers with Mr. Rosen's  
21 experience, qualifications, and job history. Mr. Carlsen will provide expert  
22 testimony regarding the long term effects of Defendants conduct.  
23  
24

1           32.    Sean Black  
2                9 S. Washington St., Suite 600  
3                Spokane, WA 99201  
4                (509) 323-0272

5           Mr. Black will provide expert testimony regarding Mr. Rosen's lost back  
6           and future wages and benefits.

7           33.    Elizabeth Rosen  
8                c/o Winston & Cashatt, Lawyers  
9                601 W. Riverside Ave., Suite 1900  
10              Spokane, WA 99201  
11              (509) 838-6131

12          Ms. Rosen is the wife of Plaintiff Cory Rosen. Ms. Rosen is expected to  
13          testify regarding Mr. Rosen's damages incurred as a result of the conduct of  
14          Defendants.

15          **Plaintiff Cory Rosen submits the following list of witnesses Plaintiff may**  
16          **call to testify at trial, if the need arises:**

17          1.    DarLin Sanchez  
18                871 Conklin Meadow  
19                Newport, WA 99156  
20                (509) 671-3915

21          Ms. Sanchez is expected to testify regarding security in the Jail and the usual  
22          practices followed by Jail staff and dispatch. Ms. Sanchez is expected to testify  
23          regarding the disciplinary practices of Defendants toward their employees.

24          2.    Ronald Froman  
               (509) 671-1254

          Mr. Froman is expected to testify regarding Mr. Rosen's performance and  
          reputation as a POCSO Deputy. Mr. Froman is expected to testify regarding

1 POCSO's practice of targeting deputies for discipline and termination. Mr. Froman  
2 is expected to testify regarding the facts and circumstances surrounding Sheriff  
3 Botzheim's election to the office of Pend Oreille County Sheriff.

- 4 3. Det. Christy Patterson  
5 E. Wenatchee Police Department  
6 271 9th St. N.E.  
7 East Wenatchee, WA 98802

8 Det. Patterson is expected to testify regarding Mr. Rosen's work history as  
9 an officer for the East Wenatchee Police Department.

- 10 4. Steve West  
11 Pend Oreille County Communications/E911 Center  
12 331 S. Garden Ave.  
13 Newport, WA 99156  
14 (509) 447-1912

15 Mr. West is expected to testify regarding the facts and circumstances  
16 surrounding the events leading to Mr. Rosen's termination.

- 17 5. Cindy Delay  
18 P.O. Box 5050  
19 Newport, WA 99156  
20 (509) 447-4021

21 Ms. Delay is expected to testify regarding Mr. Rosen's job performance as a  
22 POCSO Deputy and regarding background checks performed by potential  
23 employers of Mr. Rosen and the Department of Corrections.

- 24 6. Chief Rick Stokoe  
Boardman Police Dept.  
200 City Center Circle  
Boardman Oregon 97818  
(541) 481-6071

1  
2 Chief Stokeo is expected to testify telephonically regarding Mr. Rosen's  
3 abilities and qualifications as a law enforcement officer and regarding the City of  
4 Boardman's background check into Mr. Rosen.

- 5 7. Karen Beatty  
6 c/o of Okanogan County Central Services  
7 148 N. 3rd Ave., Rm. 105  
8 Okanogan, WA 98840  
9 (509) 422-7127

10 Ms. Beatty is expected to testify regarding the 2010 sheriff's election and  
11 Defendant's conduct toward POC SO and POC employees.

- 12 8. Jeremy Schmidt  
13 Counsel for Defense  
14 1116 W. Broadway Ave.  
15 Spokane, WA 99206  
16 (509) 477-3443

17 Mr. Schmidt is expected to testify regarding the facts and circumstances  
18 relating to the termination of Mr. Rosen from the Pend Oreille County Sheriff's  
19 Office.

- 20 9. Director Sam Castro  
21 Dept. of Public Works, Pend Oreille County  
22 625 W. 4th St.  
23 Newport, WA 99156  
24 (509) 447-4513

Director Castro is expected to testify regarding Pend Oreille County's policy governing communications with potential employers of Pend Oreille County employees, including responding to reference checks. Director Castro is expected to testify regarding Mr. Rosen's reputation in the community.

1           10.   Wendy Pratt  
2               Department of Social and Health Services, Child Protection Service  
3               Colville Republic DCFS  
4               P.O. Box 537  
5               Colville, WA 99114  
6               509-685-5660

7           Ms. Pratt is expected to testify regarding Mr. Rosen's application for  
8           employment with Child Protection Services.

9           11.   Todd Wiggs  
10               c/o Washington Department of Corrections  
11               Spokane Administrative Office  
12               1717 W. Broadway Ave.  
13               Spokane, WA 99201

14           Mr. Wiggs is expected to testify concerning any communications between  
15           Defendants and DOC after Mr. Rosen was hired as a community corrections  
16           officer by DOC.

17           12.   Questin Youk  
18               Pend Oreille County Sheriff's Office  
19               331 S. Garden Avenue  
20               Newport, WA 99156  
21               (509) 447-1914

22           Sergeant Youk is expected to testify regarding Mr. Rosen's job performance  
23           and the investigations of Mr. Rosen by Defendants. Sergeant Youk is expected to  
24           testify regarding the policies, procedures, and practices of the POCSO concerning  
25           employee discipline and communications with potential or current employers of  
26           former or current deputies.

1           13.   Deputy Eric Schutte  
2                   Pend Oreille County Sheriff's Office  
3                   331 S. Garden Avenue  
4                   Newport, WA 99156  
5                   (509) 671-1339

6           Deputy Schutte is expected to testify regarding Mr. Rosen's performance as  
7           a deputy for POCSO. Mr. Schutte is expected to testify regarding the pattern and  
8           practices of the command staff of POCSO.

9           14.   Joshua Proctor  
10                  2264 Green Rd.  
11                  Newport, WA  
12                  (509) 671-6076

13           Mr. Proctor is expected to testify regarding the facts and circumstances  
14           surrounding Mr. Rosen's discipline and termination.

15           Plaintiff reserves the right to offer witnesses identified by Defendants in its  
16           disclosure. Plaintiff reserves the right to amend and/or supplemental his Witness  
17           List as necessary. Plaintiff reserves the right to call rebuttal witnesses to respond  
18  
19  
20  
21  
22  
23  
24



1 to testimony offered by the Defendants.

2  
3 DATED this 4<sup>th</sup> day of August, 2016.

4 s/Collette C. Leland

5 Collette C. Leland, WSBA No. 40686

6 Kammi M. Smith, WSBA No. 34911

7 WINSTON & CASHATT, Lawyers

8 Attorneys for Plaintiff

9 601 W. Riverside, Ste. 1900

10 Spokane, WA 99201

11 (509) 838-6131

12 Facsimile: (509) 838-1416

13 E-mail Address: ccl@winstoncashatt.com

14 E-mail Address: kms@winstoncashatt.com

1  
2  
3 I hereby certify that on August 4, 2016, I electronically filed the foregoing  
4 with the Clerk of the Court using the CM/ECF System which will send notification  
5 of such filing to the following:  
6

7 Heather C. Yakely  
8 Evans, Craven & Lackie, P.S.  
9 hyakely@ecl-law.com

10 Attorney for Defendants

11 s/Collette C. Leland, WSBA No. 40686  
12 WINSTON & CASHATT  
13 Attorneys for Plaintiff  
14 601 W. Riverside, Ste. 1900  
15 Spokane, WA 99201  
16 (509) 838-6131  
17 Facsimile: (509) 838-1416  
18 E-mail Address: ccl@winstoncashatt.com  
19  
20  
21  
22  
23  
24